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May 17, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

Plaintiffs Haitian Bridge Alliance, African Communities Together, and UndocuBlack Network respectfully request that the Court reschedule the conference on the parties' pre-motion letters currently set for May 23. Dkt. No. 47. Undersigned counsel, who intends to argue on behalf of Plaintiffs and has been leading negotiations with the Government regarding the FOIA requests at issue, is already scheduled to be in a deposition at that time. Defendants do not oppose this request. Defendants' counsel have informed us they are available on May 25 between 1 PM and 5 PM, if the Court may be able to reschedule for then.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Sara Fatima Dhanji

Stephen J. Fuzesi (Bar No. SF2000)

Sara Fatima Dhanji (*pro hac vice*)

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